

Order No. R-8 2009-0036 (NPDES No. CAS 618036)  
Area-wide Urban Storm Water Runoff Management program  
San Bernardino County MS4 Permit  
2<sup>nd</sup> DRAFT October 22, 2009

Comments of the Orange County Water District  
November 20, 2009

OCWD provides the following comments on page 14 of 119, Section II. E. 11:

- This section references (OCWD, 2009) but there is no footnote for this reference.
- This section discusses wetlands behind Prado Dam. In general terms, there are two areas in Prado Basin that are sometimes referred to as 'wetlands'. The entire Prado Basin, covering approximately 10,000 acres, is sometimes referred to as a 'wetland'. Also, the wetlands constructed and operated by OCWD are also referred to as a 'wetland'. Please clarify whether the wetlands specifically being referred to on page 14 are the approximately 450-acre wetland system constructed and operated by OCWD or the entire Prado Basin. If the wetlands referred to on this page include both the entire Prado Basin and the OCWD constructed wetland, the water quality changes that are associated with each should be described separately. The discussion of water quality changes associated with the OCWD constructed wetland and the entire Prado Basin should not be lumped together, since this tends to confuse the reader.
- The statement that the wetland helps minimize pollutant transport to the lower watershed needs to be discussed in greater detail. The OCWD constructed wetland in Prado Basin is operated to reduce nitrate concentrations in Santa Ana River water. Operation of the wetland has been successful in reducing nitrate concentrations. Other constituents besides nitrate may or may not be reduced in concentration by the wetland. If the "pollutant transport" that is referred to in this section deals with constituents other than nitrate, these constituents should be described and the evidence for their removal in Prado Basin should be provided. For example, the water quality data or studies that document their removal should be cited.
- In addition, the majority of the annual flows of the Santa Ana River are not diverted through the OCWD wetland. During base flow conditions, approximately half of the Santa Ana River flows are diverted through the wetland. When there are significant storm flows in the river, the diversion structure is washed away which results in most of the storm flows bypassing the wetland. Therefore, generally speaking, the wetland does not treat stormwater flows.

- Regarding the statement that the Prado Dam serves to prevent trash and debris from being transported downstream, a significant amount of trash and debris passes through the dam and is transported downstream.